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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VANGUARD DEALER SERVICES, LLC
and MOTOR DEALER SERVICES GROUP,
LLC,

Plaintiffs,

v.

JORGE CERVANTES, CEC INDUSTRIES
INC. d/b/a DEALERS DIRECT SYSTEMS
and/or DEALERS DIRECT
CONSULTANTS, and ROBERT KONZEN,

Defendants.

Case No. 2:21-cv-01121-JAD-EJY

**STIPULATION AND ORDER FOR AN
EXTENSION OF DEFENDANTS
JORGE CERVANTES AND CEC
INDUSTRIES INC. d/b/a DEALERS
DIRECT SYSTEMS and/or DEALERS
DIRECT CONSULTANTS'S DEADLINE
TO FILE A RESPONSIVE PLEADING
TO AMENDED COMPLAINT [ECF No.
21] (FIRST REQUEST)**

Plaintiffs Vanguard Dealer Services, LLC and Motor Dealer Services Group, LLC and Defendants Jorge Cervantes and CEC Industries Inc. d/b/a Dealers Direct Systems and/or Dealers Direct Consultants, by and through their respective counsel of record, hereby submit the following stipulation:

1. On June 14, 2021, Plaintiffs filed their initial Complaint naming Cervantes and CEC, LLC, among others, as defendants [ECF No. 1-2]. The summonses to Defendants Cervantes and CEC, LLC were issued on June 16, 2021 [ECF Nos. 3 and 4]. Defendant Cervantes was served on July 11, 2021 [ECF No. 12].

2. On July 29, 2021, counsel for Cervantes and CEC, LLC contacted Plaintiffs' counsel requesting a two-week extension of the August 2, 2021 deadline for filing a responsive pleading to the initial

1 Complaint. Plaintiffs' counsel informed Defendants' counsel of Plaintiffs' intent to file an Amended
2 Complaint to, among other things, correct how CEC, LLC was named. Specifically, the Amended
3 Complaint would remove CEC, LLC as a defendant and add CEC Industries, Inc. as a defendant.

4 3. On August 16, 2021, Plaintiffs filed their Amended Complaint pursuant to FRCP 15(a)(1)
5 naming, among others, CEC Industries, Inc. [ECF No. 21].

6 4. On August 24, 2021, counsel entered an appearance on behalf of defendants Cervantes and
7 CEC Industries, Inc. [ECF No.25].

8 5. On August 24, 2021, counsel for Cervantes and CEC Industries, Inc. signed an Acceptance of
9 Service of the Amended Complaint, which was filed on August 26, 2021 [ECF No. 26].

10 6. As part of the agreement to accept service, counsel for Cervantes and CEC Industries, Inc.
11 requested an extension through September 27, 2021 to file a responsive pleading to the Amended
12 Complaint.

13 7. WHEREAS, Plaintiffs and Defendants Cervantes and CEC Industries, Inc. hereby stipulate
14 and agree to extend the deadline for Cervantes and CEC Industries, Inc. to file their responsive
15 pleading to the Amended Complaint to September 27, 2021.

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8. This is the first stipulation for extension of time for Defendants Cervantes and CEC Industries, Inc. to respond to Plaintiffs' Amended Complaint. The extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

DATED: August 26, 2021.

AKERMAN LLP

/s/ Melanie D. Morgan

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Attorneys for Plaintiffs Vanguard Dealer Services, LLC and Motor Dealer Services Group, LLC

DATED: August 26, 2021.

SEMENZA KIRCHER RICKARD

/s/ Lawrence J. Semenza

LAWRENCE J. SEMENZA, III, ESQ.

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Attorney for Defendants Jorge Cervantes and CEC Industries Inc. d/b/a Dealers Direct Systems and/or Dealers Direct Consultants

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Case No. 2:21-cv-01121-JAD-EJY

August 27, 2021

DATED